

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff

v.

AHSHA NATEEF TRIBBLE [1]

Defendant

Criminal No. 19-541 (FAB)

MOTION FOR JOINDER

TO THE HONORABLE COURT:

COMES NOW defendant Ahsha Nateef Tribble, by and through the undersigned attorneys, and respectfully joins the *Motion to Transfer Venue* filed by co-defendant Donald Keith Ellison [Docket No. 94]. In support thereof, the defendant states and prays:

1. Ms. Tribble and Mr. Ellison are charged in the six of the same counts of the Indictment filed in this matter. [Docket 3].
2. The Motion to Transfer Venue [Docket No. 94] addresses the issues and concerns that may prohibit Ms. Tribble and/or Mr. Ellison from having a “fair and impartial” jury trial in the District of Puerto Rico.
3. The attachments to the Motion to Transfer Venue are also relevant for the location of any trial of Ms. Tribble, particularly the results of an extensive venue study, and the transcript of a government press conference led by the then

United States Attorney for the District of Puerto Rico. [See also Part III-**This Case Receives Extensive Prejudicial News Coverage. Docket 94, pages 8-10**]. In addition to the extensive, prejudicial publicity against defendants and the press conference by the former U.S. Attorney, defendant Tribble was the subject of numerous threats in the social and local media.

4. The issues, arguments and caselaw thoroughly addressed in the Motion to Transfer Venue is highly relevant to both defendants, and joinder by Ms. Tribble would save judicial resources.

WHEREFORE, it is respectfully requested that the Court grant this Motion for Joinder.

CERTIFICATE OF SERVICE: I hereby certify that on March 24, 2020, I electronically filed the foregoing Motion for Joinder with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on March 24, 2020.

s/Deana Timberlake-Wiley
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